

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Mark E. McLure, and  
Erica S. Quiggle,  
Debtors. . . . .

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Mark E. McLure, and  
Erica S. Quiggle, . . . . .  
Movants, . . . . .  
v. . . . .  
Freedom Mortgage Corporation, . . . . .  
Respondent. . . . .

Bankruptcy Case No.: 19-20310-CMB  
Chapter 13  
Document No.:  
Related to Document No.:  
Related to Claim No.: 2

**DEBTORS' DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on November 8, 2020, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtors that the existing payment is sufficient to fund the Plan even with the proposed change for December 1, 2020.

The new post-petition monthly payment payable to Respondent is \$1,531.49, effective December 1, 2020, per the notice dated November 8, 2020. The Debtors' Plan payment provides for a monthly payment to Freedom Mortgage Corporation of \$1,542.15. Therefore, Debtors' Plan remains sufficient.

Respectfully Submitted,

Date: November 13, 2020

/s/Brian C. Thompson

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